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Federal Communications Commission  
Office of Secretary

December 13, 1996

Honorable Reed Hundt, Chairman  
Honorable Rachelle Chong, Commissioner  
Honorable Susan Ness, Commissioner  
Honorable James Quello, Commissioner  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D. C. 20554

Re: Ex Parte -- CC Docket No. 95-116, Telephone Number Portability

Chairman Hundt and Commissioners Chong, Ness and Quello:

The undersigned parties wish to respond to the letter you recently received from representatives of the incumbent local exchange companies. In that letter the Commission was asked to alter its June, 1996 Order ("Order") in this proceeding to permit deployment of a number portability arrangement referred to as Query on Release or QOR. The QOR portability scheme is alleged to be an acceptable alternative or enhancement to the nationally recognized number portability solution, Location Routing Number or LRN. The QOR scheme is not acceptable or consistent with the Telecommunications Act of 1996 ("1996 Act"), and we write to you today to express our strong *opposition* to it.

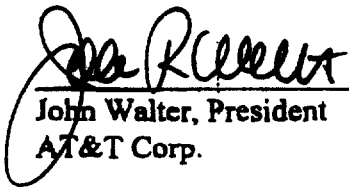
The Commission's Order determined, in great detail, why QOR cannot be deployed consistent with neutral local competition and the 1996 Act. In that Order, the Commission established nine performance criteria for acceptable number portability solutions that will ensure competitive neutrality and correctly determined that QOR failed to meet two of the nine performance criteria. Among other things, the Commission determined that QOR caused discrimination among and between various local exchange networks and required increased reliance on networks of incumbent local exchange carriers with which new entrants must compete. The ILECs have never refuted this fundamental fact.

The only real basis for the ILEC request is alleged cost savings. The information compiled by the Commission since its Order, however, shows that these alleged cost savings are illusory. QOR's alleged cost efficiencies accrue only to the signaling network. QOR is much less efficient in the trunking network; i.e., the voice and data path. Thus, when the impact on the network as a whole is calculated, QOR fails to result in any cost savings. Equally important, the Commission correctly determined that cost savings to carriers could not justify a number portability solution that would impair competition and thereby deny cost savings or other benefits to customers.

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Finally, the Commission should recognize that LRN, and LRN alone, has been endorsed and selected by every state commission which has undertaken the task of evaluating the various number portability solutions proposed by the industry. QOR has been neither endorsed nor selected by any. The Order reinforced the state commission decisions by concluding the same. The record compiled since the Order serves only to further support its initial conclusions. We are urging you to reaffirm the conclusions reached in June of this year and deny the incumbent LEC's petitions for reconsideration of that Order.

Sincerely,



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John Walter, President  
AT&T Corp.

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Timothy F. Price, President and CEO  
MCI Communications Corp.

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James Q. Crowe, Chairman and CEO  
MFS Communications, Inc.

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Bernard J. Ebberts, President and CEO  
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James M. Smith, President  
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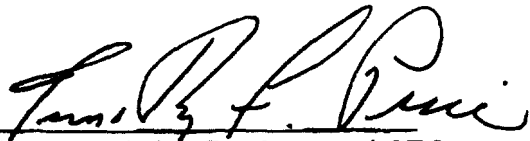
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